

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE ZINC ANTITRUST LITIGATION

Civil Action No. 14-cv-3728 (PAE)

This document relates to:

ALL ACTIONS

**PLAINTIFFS' NOTICE OF UNOPPOSED MOTION FOR PRELIMINARY
APPROVAL OF PROPOSED SETTLEMENT, CERTIFICATION OF A
SETTLEMENT CLASS, AUTHORIZATION TO DISSEMINATE CLASS
NOTICE, APPOINTMENT OF CLASS COUNSEL, ESCROW AGENT AND
CLAIMS ADMINISTRATOR, AND THE SCHEDULING OF A
FAIRNESS HEARING FOR FINAL APPROVAL OF PROPOSED SETTLEMENT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum in Support of Preliminary Approval of Proposed Settlement, Certification of a Settlement Class, Authorization to Disseminate Class Notice, Appointment of Class Counsel, and the Scheduling of a Fairness Hearing for Final Approval of Proposed Settlement; the Joint Declaration of Joseph H. Meltzer, Benjamin M. Jaccarino, Linda P. Nussbaum, and Solomon B. Cera and the exhibits thereto; and upon all prior papers and proceedings herein as well as such further argument as the Court may allow at any hearing on the motion, Plaintiffs Oklahoma Steel and Wire Co., Inc., Iowa Steel and Wire Co., Southwestern Wire, Inc. and Jasper Materials, Inc., hereby move this Court for entry of the Preliminary Approval Order submitted herewith, pursuant to Rules 23(a), 23(b)(3), 23(e), and 23(g) of the Federal Rules of Civil Procedure, that: (i) preliminarily approves the proposed settlement of this class action; (ii) certifies the Settlement Class; (iii) authorizes dissemination of the Notice of Proposed Class Action Settlement with Glencore Ltd. and Access World (USA) LLC (f/k/a Pacorini Metals USA, LLC) and Hearing on Settlement Approval; (v) appoints Kessler

Topaz Meltzer & Check LLP, Lovell Stewart Halebian Jacobson LLP, Nussbaum Law Group, P.C., and Cera LLP as class counsel; (vi) appoints The Huntington National Bank as escrow agent and Angeion Group as claims administrator; and (vii) schedules a fairness hearing for final approval of Settlement. Defendants consent to this motion and entry of the Preliminary Approval Order submitted herewith.

Dated: July 23, 2021

Respectfully submitted,

s/ Joseph H. Meltzer

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